

Dear Small Entity

> Representatives,

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> Thank you again for your time and valuable contributions to last Wednesday's panel outreach meeting for the proposed rulemaking for paint removers under TSCA Section 6a. As EPA emphasized, the Agency is interested in learning more about sales to commercial and consumer users of methylene chloride and NMP in paint and coating removal. In addition to the questions circulated earlier for discussion, the information below would be most helpful to the Panel.

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Additionally, EPA was also asked how it was incorporating findings from the Eastman study on methylene chloride exposure. Information on that is below:

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> Sales-related questions:

1) What percent of your business product lines are paint removers? **Four (4) %**

a. Of that, what percent contain methylene chloride? **Fifty (50) %**

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b. Of that, what percent contain NMP? **NONE**

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c. Can you provide the sales volume or revenue by product or primary active solvent (methylene chloride, NMP, etc)? **NA**

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2) Do you sell paint removers containing alternative chemicals to methylene chloride and NMP? **NO**

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a. If so, can you provide information on the sales volume of these product lines? **N/A**

>

b. Have you noticed an increase in sales of these products over the past few years? **No**

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3) Can you distinguish in any way the portion of your product sales between sales to consumers and sales to professional users? **No**

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a. If so, can you provide what that breakdown is? **N/A**

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4) Is it possible to distinguish at your level between customers who are individuals/hobbyists vs. commercial users, particularly commercial users of small quantities of products? **No**

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5) Can you distinguish wholesale product sales (larger volume containers, such as 55 gal drums) versus small product volume sales? **NO sales of larger volume.**

And if so can you separate sales percentages between the wholesale products and those of smaller containers? **N/A**

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6) In which retailers or other channels are your sales conducted? **Ace Hardware**

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Eastman Study:

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The Eastman study by Friedlander et al., 1978 was used in the EPA/IRIS Toxicological Review and in EPA's risk assessment for methylene chloride and cited as EPA, 2011. Findings from the Friedlander et al., 1978 study and the four additional cohort studies and 13 case-control studies were reviewed. Considering the full body of knowledge in humans, EPA identified increased risks for brain, specific hematopoietic and other cancers. EPA incorporated those findings in the weight of evidence in making the "likely to be carcinogenic to humans" determination.

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> As you may recall, EPA had requested to receive your written feedback to the outreach meeting by next Wednesday, June 29. However, given these additional questions for your consideration, we will accept written comments through the close of business on Friday, July 1. Please note, that if you believe any of the information you have includes, Confidential Business Information (CBI), which is broadly defined as proprietary information, considered confidential to the submitter, the release of which would cause substantial business injury to the owner, you contact me immediately. You should not submit CBI by email. Instead, please call me at (202) 564-0301 so provide you details about the proper handling and mailing procedures.

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> Thank you again and please do not hesitate to contact me if you have any questions.

>

> Nathaniel Jutras | U.S.

> Environmental Protection Agency | Regulatory Management

> Division | 202.564.0301

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